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Remarks/Arguments

Claims 1-11, 16-21, 26-40, 43, and 44 were pending in this application. Applicants have amended claims 1, 18, and 26 herein. Applicants have cancelled claims 4, 21, 28, 34, and 35 herein. Upon entry of this amendment, claims 1-3, 5-11, 16-20, 26, 27, 29-33, 36-40, 43, and 44 will be pending in this application. Applicants submit that this response puts the application in condition for allowance and request entry of the amendments and reconsideration of the application.

The Examiner has maintained her rejection of claims 1, 3-5, 10, 18, 20, 21, 26, 28, 29, 34, 36, and 38 as anticipated under 35 U.S.C. § 102(b) in view of U.S. Patent 5,794,142 to Vantilla et al. ("Vantilla"). Applicants have canceled claims 4, 21, 28, and 34, rendering this rejection moot for those claims. With respect to the other claims in this group, Applicants reiterate that for a claim to be anticipated by a reference, the reference must disclose every element of the claimed invention. Applicants' invention pertains to registering licensed modules, where a licensed module is a software package that resides within the mobile terminal. Vantilla, by contrast, pertains to enabling network services, that is, functions activated at the network provider's site. See, among other places, Vantilla, col. 6, lines 13-15. Applicants' independent claims 1 and 18 as amended recite a "software package in a processing platform of the mobile device." Applicants' claim 26 already recited that the licensed module resided in the processing platform of a mobile device, but claim 26 has been amended to make the definition of licensed module explicit by referring to it as a "software package." Support for these recitations can be found in Applicants' Fig. 4 as well as in the specification in paragraphs [0002], [0014], and [0040]. These recitations are incorporated in all dependent claims through their dependency. Applicants submit that the claims as amended are patentably distinguishable from Vantilla for at least this reason.

In addition to the above, Applicants respectfully maintain that these claims are patentably distinguishable from Vantilla for the same reasons discussed in the previous response, namely that in Vantilla, a user consciously identifies a network feature that is not currently enabled, but is to be activated and then takes deliberate steps to activate that feature. This process includes selecting a feature from "a displayed list of non-enabled functions." Vantilla, col. 6, lines 17-18. This process in Vantilla is decidedly not transparent to the user, since the user must understand

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that she or he is requesting a new network feature to be activated, and the user cannot use that feature until the activation is complete. The transparency of Applicants' claimed process enables a user to not even know she or he is doing anything other than using one of the built-in functions of the mobile phone.

The Examiner has rejected claims 2, 8, 16, 17, 19, 27, 37, 43, and 44 under 35 U.S.C. § 103(a) in view of Vantilla in combination either admitted prior art or with U.S. Patent 6,260,141 to Park. The Examiner has similarly rejected claims 6, 7, 9, 11, 30, 31, 35, 39, and 40 in view of Vantilla in combination with European Patent 1 246 428 to Nokia, as well as claims 30, 31, 33, 35, 39, and 40 in view of Vantilla in combination with admitted prior art and EP 1 246 428 to Nokia. Claim 35 has been canceled herein, rendering the section 103 rejection moot for that claim. For all of the other claims, the Examiner relies on the Vantilla to disclose the limitations of the base independent claims for purposes of section 103, and Applicants submit that in view of the arguments presented in the preceding paragraphs of this response, Vantilla does not disclose those limitations. Thus, all of the claims rejected under section 103 are patentable for at least the same reasons discussed above.

In addition to the amendments discussed above, the phrase "at least one" has been added to claim 27 to correct an antecedent basis error. Also, claims 4, 21, and 28 have been canceled to be consistent with the amendments previously made to the independent claims regarding registration being transparent to the user. Claims 34 and 35 have been canceled since their intervening dependent claim has been canceled.

Applicants submit that they have responded to all concerns raised by the Examiner. Reconsideration of the application as amended is hereby requested.

Respectfully submitted,

Date: 13 JAN 06

Telephone: (919) 286-8000
Facsimile: (919) 286-8199



Steven B. Phillips
Registration No. 37,911
Moore & Van Allen PLLC
P.O. Box 13706
Research Triangle Park, NC 27709-3706

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